

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION**

TEL-TRON TECHNOLOGIES  
CORPORATION, a Florida corporation,

Plaintiff,

vs.

CASE NO: 6:11-cv-1448-ORL-18-GJK

STANLEY SECURITY SOLUTIONS,  
INC., d/b/a STANLEY HEALTHCARE  
SOLUTIONS, a Connecticut  
corporation,

INJUNCTIVE RELIEF REQUESTED  
JURY TRIAL REQUESTED

Defendant.

\_\_\_\_\_ /

**COMPLAINT**

Plaintiff Tel-Tron Technologies Corporation, through its undersigned counsel, files its Complaint against Defendant Stanley Security Solutions, Inc., d/b/a as Stanley Healthcare Solutions, and states as follows:

**PARTIES, JURISDICTION AND VENUE**

1. Plaintiff Tel-Tron Technologies Corporation ("Tel-Tron") is a Florida corporation.
2. Defendant Stanley Security Solutions, Inc. is, upon information and belief, a Connecticut corporation doing business as Stanley Healthcare Solutions ("Stanley"). Upon information and belief, Stanley has its principal place of business in Indianapolis, Indiana, and sells and offers for sale products in the United States, including within this division of the Middle District of Florida.

3. Stanley infringes Tel-Tron's patent in the United States, including this Division of the Middle District of Florida.

4. This Court has jurisdiction over the subject matter of this action as to Stanley pursuant to 28 U.S.C. §§ 1331 and 1338(a).

5. This Court has *in personam* jurisdiction as to Stanley because, upon information and belief, subject to general or specific jurisdiction in this State because Stanley is registered to do business in Florida. Additionally, upon information and belief, Stanley sells and offers to sell products that infringe one or more claims of Tel-Tron's patents in Florida or places such products in the stream of commerce with the knowledge that the infringing products will be sold in Florida.

6. Venue properly lies within this judicial district and division, pursuant to 28 U.S.C. §§1391(c) and 1400(b).

### **STATEMENT OF FACTS**

7. By written assignment, Tel-Tron is the sole and exclusive owner of United States Patent No. 6,646,549 B2 ("the '549 Patent"), a valid and enforceable U.S. Patent, which is attached hereto as Exhibit A.

8. Tel-Tron is a leading innovator and manufacturer in emergency call technology. Tel-Tron offers its customers emergency call systems for communities that are linked to a remote data center for receiving data regarding the emergency call system.

9. Brian Dawson, CEO of Tel-Tron, is an innovator in the emergency call system field. The '549 Patent describes some of Mr. Dawson's inventions in the field. Mr. Dawson has assigned all of his rights to the inventions claimed in the '549 Patents to Tel-Tron.

10. Upon information and belief, Stanley has sold and offered for sale in the United States and in this Judicial District emergency call products that directly or indirectly infringe upon one or more claims of the Patents-in-Suit.

11. Tel-Tron has not granted Stanley any license to practice the '549 Patent.

### **COUNT I**

#### **Action for Infringement of the '549 Patent**

12. Count I is an action by Tel-Tron against Stanley for monetary damages and injunctive relief for Stanley's infringement of the '549 Patent.

13. Tel-Tron herein restates and reincorporates into this Count the allegations of Paragraphs 1 through 11 herein.

14. Upon information and belief, Stanley has made and/or offered for sale and sold and/or distributed products that infringe directly, by inducement and/or contributorily, one or more claims of the '549 Patent.

15. Tel-Tron is entitled to compensatory damages and injunctive relief for Stanley's infringing activities.

16. Upon information and belief, Stanley lacks justifiable belief that there is no infringement or that the infringed claims are invalid and has acted with

objective recklessness in its infringing activity. Stanley's infringement is therefore willful, and Tel-Tron is entitled to an award of exemplary damages, attorneys' fees, and costs in bringing this action.

Wherefore, Plaintiff Tel-Tron prays this Honorable Court enter such preliminary and final orders and judgments as are necessary to provide Tel-Tron with the following requested relief:

A. A preliminary and then permanent injunction enjoining Stanley from infringing each of the Patents-in-Suit;

B. An award of damages against Stanley under 35 U.S.C. §284 in an amount adequate to compensate Tel-Tron for Stanley's infringement, but in no event less than a reasonable royalty for the use made by Stanley of the inventions set forth in the Patents-in-Suit;

C. An award against Stanley for exemplary damages, attorneys' fees, and costs under 35 U.S.C. § 285; and

D. Such other and further relief as this Court deems just and proper.

**JURY TRIAL REQUEST**

Tel-Tron requests a trial by jury as to all matters so triable.

Respectfully submitted August 30, 2011.

/s/Ryan T. Santurri

Brian R. Gilchrist, Trial Counsel

Florida Bar No. 774065

[bgilchrist@addmg.com](mailto:bgilchrist@addmg.com)

Ryan T. Santurri

Florida Bar No. 0015698

[rsanturri@addmg.com](mailto:rsanturri@addmg.com)

**Allen, Dyer, Doppelt**

**Milbrath & Gilchrist, P.A.**

255 South Orange Avenue, Suite 1401

Post Office Box 3791

Orlando, FL 32802-3791

Telephone: 407-841-2330

Facsimile: 407-841-2343

**Attorneys for Plaintiff,**

Tel-Tron Technologies Corporation